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February 23, 2016

BY ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
New York, New York 10007

Re: Ramsey Baines v. The City of New York, et al.,
15 CV 01472-SLT-VMS

Your Honor:

I am the attorney in the Special Federal Litigation Division of the New York City Law Department assigned to represent defendants the City of New York, Sergeant Forrest Hirsch and Officers Jonathan Thomas, Walter Feit, Tiffany Mitchell and Daniel Roman in the above-referenced matter.¹ Defendants write on behalf of all parties to respectfully inform the Court that plaintiff has accepted a Rule 68 Offer of Judgment. The parties are in the process of negotiating plaintiff's reasonable attorney's fees and hope to reach a settlement soon. Once an agreement is reached, the parties will prepare the necessary settlement paperwork and forward a stipulation of dismissal to the Court.

¹ This case is being handled by Assistant Corporation Counsel Fayola Alibey, whose bar admission in New York is currently pending and who is not yet admitted in the Eastern District. Ms. Alibey is handling this matter under supervision and can be reached at (212) 356-2334.

Thank you for your time and consideration.

Respectfully submitted,

/s/

Daniel Passeser

Assistant Corporation Counsel

cc: BY ECF
Robert Marinelli, Esq.
Attorney for Plaintiff